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Attorneys for Plaintiff

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

CAA INDUSTRIES, LTD.,

Plaintiff,

v.

Case No.: 2:22-cv-00581-GMN-EJY

RECOVER INNOVATIONS, INC.
d/b/a RECOVER TACTICAL,

Defendant.

JOINT MOTION TO STAY DISCOVERY

In accordance with the Court's Order dated March 4, 2024, Dkt. No. 62, the Parties jointly move this Court for a stay of all discovery for a period of one month beginning on March 19, 2024, and ending on April 18, 2024, at which time the Parties shall submit a joint proposed discovery plan and scheduling order.

1 Plaintiff's undersigned counsel, Ryder, Mazzeo & Konieczny, LLC, will be starting a
2 trademark infringement and false advertising trial in the U.S.D.C. for the Eastern District of
3 Pennsylvania starting on March 18, 2024. The trial is expected to last two weeks. All attorneys
4 of Plaintiff's undersigned law firm must temporarily devote all of their efforts to this prior-filed
5 litigation.

6 This request is brought for good cause and not for the purpose of delay.

7 For the foregoing reason, the Parties respectfully request this Honorable Court to
8 GRANT their Joint Motion to Stay Discovery.

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11 Dated: March 13, 2024

RYDER, MAZZEO & KONIECZNY LLC

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13 /s/ Joseph M. Konieczny, Sr.
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And

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Attorneys for Defendant

IT IS SO ORDERED:

A handwritten signature in blue ink, reading "Elayna J. Youchah", is written over a horizontal line.

THE HONORABLE ELAYNA J. YOUCHAH
UNITED STATES MAGISTRATE JUDGE

DATED: March 13, 2024